

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

In the Matter of)	
)	
Digital Audio Broadcasting Systems and)	MM Docket No. 99-325
Their Impact on Terrestrial Radio)	
Broadcast Service)	
CONCERNING NIGHTTIME AM IBOC		
AUTHORIZATION		

REPLY Comments of PAUL DEAN FORD, P. E.

Quoting Timothy C. Cutforth's Reply Comments, "I believe that an across the board authorization of night IBOC operation without full compliance with the FCC allocations rules is an abrogation of the duties of the FCC to control interference as required in the communications act." I agree completely! There are so many flaws in the IBOC system that it would be funny if it were not so terribly destructive. How can the FCC be so naïve as to believe this pseudo engineering when bona fide engineering speaks the truth about this destroyer of AM radio broadcasting? Where are the engineers at the FCC? The Reply Comments of Timothy C. Cutforth are solid and **must** be considered by the Commission.

When Cuba interfered with our nighttime AM radio broadcasting, the FCC helped overcome obstacles so that we could continue nighttime AM service. Now, it appears, Cuba didn't do the job well enough so we have to do the job for them and eliminate AM broadcasting in the Western Hemisphere.

"A Look at the Digital Horizon" by Barry McLarnon in the July 2004 issue of *Radio Guide* is must

reading prior to any action. This article demonstrates why iBiquity's IBOC is a disaster and states that it violates the Canada-US Agreement. His conclusion "Broadcasters should be viewing this development with considerable alarm, and proceeding with caution instead of rushing headlong into disaster." **Listen FCC.** Please do not put America's excellent broadcast capabilities at risk by fiat from within.

The IBOC goal is laudable; the technology is flawed.

Nero is said to have fiddled while Rome burned. Now, the FCC (Nero) is tuning up its "iBiquity." fiddle and intends to make all of us dance to the tune of IBOC (really IBAC) while Rome (the entire AM broadcast service) burns. Finally, the savages from the spectrum grabbers will come in and take over the band for CB (citizen's band), or whatever, usage.

Let's smash the iBiquity fiddle and return to the common sense of protecting and utilizing our AM Broadcast Channels.

Submitted this 29th day of July, 2004 by

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